

PUBLIC VERSION

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

CANON INC. AND CANON U.S.A., INC.

Defendants.

CIVIL ACTION 6:20-cv-00981-ADA

**DECLARATION OF MATT HOGAN IN SUPPORT OF
PLAINTIFF WSOU INVESTMENTS, LLC'S OPPOSITION TO
CANON U.S.A., INC.'S MOTION TO TRANSFER FOR IMPROPER VENUE
AND CANON U.S.A., INC.'S AND CANON INC.'S MOTION TO TRANSFER
FOR CONVENIENCE TO THE EASTERN DISTRICT OF NEW YORK**

I, Matt Hogan, hereby declare and state as follows:

1. I currently serve as the Managing Director of Business Development for WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”), in Waco, Texas. I have been Managing Director of WSOU since February 2020 and have relevant knowledge of WSOU’s business operations and development.

2. I submit this Declaration in Support of WSOU’s Opposition to Canon U.S.A., Inc.’s Motion to Transfer For Improper Venue and Canon U.S.A., Inc.’s and Canon Inc.’s Motion to Transfer for Convenience to the Eastern District of New York. The statements set forth below are true and correct to the best of my knowledge and belief based upon information available to WSOU. I would testify competently as to these statements if called to do so.

3. WSOU is a limited liability company that is incorporated in Delaware.

4. WSOU's principal place of business is located at 605 Austin Avenue, Suite 6, Waco, Texas 76701.

5. WSOU's principal place of business is less than two blocks from the Waco Division Courthouse.

6. The Waco office is WSOU's only office.

7. WSOU conducts its business from the Waco office and stores its documents there. In fact, WSOU's hard-copy and electronic documents regarding the '714 Patent, including the patent, patent prosecution file, assignment, asset purchase agreement and chain of title as well as all related correspondence, are located in the Waco office.

8. WSOU's employees with relevant knowledge about this case, including myself and WSOU's Assistant General Counsel, Sheyanna Pietras (who is working with outside counsel on this case and has knowledge about the '714 Patent and related chain of title information as well as WSOU's allegations regarding Canon's patent infringement activities) are in the Waco office. These employees, and any other WSOU employees or representatives whose testimony is necessary, are ready and willing to appear for trial in the Western District of Texas.

9. WSOU does not have any offices, documents or employees in the Eastern District of New York. WSOU's Head of Finance, Aaron Garvey, who currently resides in the Southern District of New York and works from home due to the pandemic, does not have relevant information about this case.

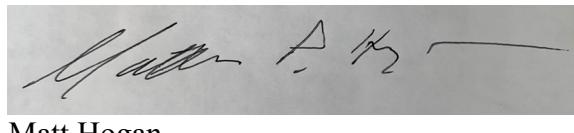
10. WSOU chose Waco as its headquarters due to Waco's burgeoning tech business and welcoming community. Over the past several years, WSOU has established roots in the Waco community. Among other things, WSOU has established relationships with local Waco vendors and banks, and has been actively involved in Baylor University's Covid-19 relief efforts.

11. WSOU uses the local company, Heart of Texas Network Consultants, to maintain its servers, which store WSOU's email accounts and electronic documents. WSOU has also engaged in

hiring students from Baylor Law School to support its business. In addition, WSOU has been working on a collaboration with Startup Waco, a local co-working space that provides workspace for designers, developers, entrepreneurs and business owners.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on the 27th day of December, 2021.

A handwritten signature in black ink, appearing to read "Matt Hogan".

Matt Hogan